



California Regional Water Quality Control Board

San Diego Region

Alan C. Lloyd, Ph.D.
Secretary for
Environmental
Protection

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Arnold Schwarzenegger
Governor

February 28, 2005

Daniel Borunda
Environmental Protection Specialist
USIBWC, Environmental Management Division
4171 North Mesa Street, C-310
El Paso, Texas 79902

In reply refer to:
POTW:01-0732.02:hansd

Dear Mr. Borunda:

COMMENTS ON DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (DSEIS) FOR CLEAN WATER ACT COMPLIANCE AT THE SOUTH BAY INTERNATIONAL WASTEWATER TREATMENT PLANT (SBIWTP)

On December 29, 2004 the Regional Board was provided a copy of the subject document. Below are our comments:

1. The Regional Board considers the following factors to be important in evaluating alternatives for providing secondary treatment of sewage generated in Mexico and would like to see them incorporated into the DSEIS:
 - Maximum utilization of the South Bay Ocean Outfall rather than beach or river discharge
 - Facility location (facilities located in the United States are more easily regulated by the Regional Board)
 - Cost effectiveness and efficiency
 - Dependability
 - Provision for a minimum of 25 million gallons per day for secondary treatment of the effluent now discharged from the SBIWTP
2. The DSEIS refers to the "Japanese Credit Plants" which will treat up to 33 million gallons per day (mgd) of raw sewage. The Regional Board is concerned that effluent from those facilities may be directly or indirectly discharged into the Tijuana River resulting in degradation of water quality in the basin. The construction of a land outfall in Mexico leading to the South Bay Ocean Outfall would afford another disposal option. This issue should be considered in the evaluation of alternatives in the DSEIS.
3. Alternative 4 includes options for either operation or shutdown of the SBIWTP. As described in the DSEIS, continued operation of the SBITWP would require up to a 12.5-mile,

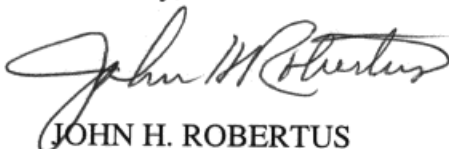
California Environmental Protection Agency

48-inch force main and pump station for conveyance of primary treated wastewater from the SBIWTP to secondary facilities to be constructed in Mexico. Appendix F, Table F-10 lists the pump station and influent conveyance capital costs at \$19.7 million and the annual operation and maintenance (O&M) costs of the SBIWTP and pump station to be approximately \$6.4 million. No assumptions are provided for those cost calculations (e.g. energy costs, pump size, elevation change, etc). The DSEIS states that shutdown of the SBIWTP would require additional screening and grit removal at the secondary facilities to be constructed in Mexico, however, no details are provided regarding the capital or O&M costs associated with those facilities. The capital and O&M costs associated with construction and operation of the force main and pump station versus additional screening and grit removal facilities should be more thoroughly compared and evaluation for cost effectiveness.

4. Section 4.11 states that an "action would be considered to have a significant impact on the environment if it encourages activities that result in the use of large amounts of fuel, or if it uses fuel or energy in a wasteful manner." The section asserts that the energy consumption required for operation of the new pump station required in implementation of Alternative 4, Options A and C is insignificant and that the associated energy consumption is not wasteful or inefficient. However, according to Table F-10, the electricity costs for operating the pump station for conveyance of effluent from the SBIWTP to the secondary treatment facility in Mexico are \$960,000 per year. Furthermore, Alternative 4, Option B, which would entail shutdown of the SBIWTP, would provide additional energy savings. Please provide additional support for the assertion that the higher energy requirements associated with Alternative 4, Options A and C are not significant, wasteful, or inefficient when compared to other alternatives.

The Regional Board appreciates the opportunity to provide comments on the subject document. If you have any questions, please contact Mr. David Hanson at (858) 467-2724 or dhanson@waterboards.ca.gov.

Sincerely,



JOHN H. ROBERTUS
Executive Officer

cc:

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